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October 4, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Rhonda E. McBride
Ormet Corporation RPM
Hazardous Waste Enforcement Branch (5HS-11)
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 S. Dearborn Street
Chicago, IL 60604

and

Mr. Richard Stewart
Ormet Site Coordinator
Ohio Environmental Protection Agency, SEDO
2195 Front Street
Logan, OH 43138

Re: **Agencies' Request for Additional RI Field Work**

This is in response to your letter dated August 24, 1990 and reflects the discussions and agreements reached during your site visit on September 13, and our conference calls on September 17 and 24, 1990, concerning your written request. As you know, Ormet conducted, under the direction of its contractor E²M, a ten-month PM-10 Air Monitoring Program at the site as part of the RI Phase I SOW. The purpose of the Air Monitoring Program was to determine PM-10 impact from the suspected source areas noted in your letter. These PM-10 data were submitted to the Agencies in the E²M Report dated April 1989. In the Agencies' response to the data submittal, you requested that Ormet present the data using a commonly accepted differencing technique where upwind and downwind monitoring data are subtracted to give the impact of the sources between the monitors. This was specifically requested by the Agencies to remove the impact from the manufacturing sources and other sources in the area, thus revealing the monitored impact from the former disposal ponds and the former potliner storage area. This was completed and presented in the E²M Report dated October 26, 1989.

It is our understanding that after your site visit and our conference calls, you have agreed that the AM-3 and AM-4 data presented in the E²M October 26, 1989 submittal will be used as a "Reality Check" on emission factors derived from sieve analyses of the suspected source areas. It is [illegible] that Ormet will participate in the development of emission factors in modeling efforts to determine potential impacts from the suspected source areas as well as [illegible] the performance of the Endangerment Assessment for [illegible]. Ormet's contractor, Geraghty & Miller, will obtain samples for sieve analyses as described below, and E²M will provide wind speed and direction data from Ormet's monitoring site in a usable format. The air stability class data from Pittsburgh, Pennsylvania, the nearest STAR Station representing the meteorological and geological conditions of the Ormet site, will also be provided if needed.

It should be noted that during our conference calls, Ormet pointed out that the proper model to use for this exercise is either the FDM Model or the ISCST Model. The FDM Model is specifically recommended by USEPA for determining fugitive dust impacts from CERCLA sites. These models should be evaluated for use rather than the ISCLT Model as suggested by USEPA's contractor.

Ormet will provide particle-size distribution through eleven sieve analyses: one from each of the four small ponds, two from the former potliner storage area, and five from Pond 5, the largest potential source of fugitive dust. Each of the eleven samples will be a composite collected over the surface area of the suspected source area or subdivision of the suspected source area. Where possible, the suspected source area subdivisions will correspond to subdivisions established in the Phase I SOW.

If you have any questions or comments, please let me know.

Very truly yours,

JD Rossi

[illegible] Manager
Corporate Environmental Services

JDR:jg

cc: Robert Fargo, G&M
Frank Jones, G&M
Larry Simmons, E²M
JoAnn Duchene, Life Systems
R. S. Wiedman, ESC&M
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